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cc: "Jeff Quyle (Jeff Quyle)" <jquyle@indremcs.org>, "Randy W. Price" <rprice@whitecountyremc.com>, "Casey Crabb" <ccrabb@whitecountyremc.com>, "Mary L. Keever" <mkeever@whitecountyremc.com>, "Mike Rice" <mrice@whitecountyremc.com>

Subject: Energy Star rating for water heaters

05/15/2003 06:04 PM

Dear Mr. Karney,

I understand DOE is now extending the Energy Star label to water heaters. The energy rating system encourages people to purchase more energy efficient home appliances, and has been used for air conditioners, refrigerators, and other appliances.

I would like to submit that electric waters are 100% efficient at the "point of use". The electric resistance heating element is directly immersed in the water, therefore, all heat produced by the element is used in producing hot water. The only measurable heat loss is through the insulation, around and on top of the outside of the tank. Today's electric water heaters can reach up to 86% efficiency with foam insulation.

Compare this to a gas water heater with much lower efficiency at the "point of use". Since, the heat is applied from the outside of the tank and up the flu. Also, insulation can not be effectively applied on top of the tank, where the Flu is located and where most of the heat loss is.

Based on the above comments, I urge you to adopt a standard that will not harm the resistance water heater's image. I appreciate the opportunity to submit the above comments, for your consideration, as a stakeholder input", for the Energy Star program.

Thanks Again,

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